

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

TAMMY COVINGTON and )  
JEFFREY COVINGTON, )  
                        )  
Plaintiffs,           )  
                        )  
vs.                   )                      Case No. 19-cv-00718-PRW  
                        )  
CSAA FIRE AND CASUALTY )  
INSURANCE, d/b/a AAA FIRE AND )  
CASUALTY INSURANCE COMPANY, INC. )  
                        )  
Defendant.           )

**JOINT MOTION TO EXTEND DISCOVERY  
FOR THE PURPOSE OF ONE DEPOSITION**

The Plaintiffs, Tammy Covington and Jeffrey Covington, and the Defendant, CSAA Fire and Casualty Insurance Company (“CSAA”), jointly request an Order of this Court, pursuant to Local Rule 7.1(h), extending discovery in the above case five (5) days for the limited purpose of deposing one additional witness who is unable to give a deposition prior to the discovery cutoff date of August 14, 2020. In support hereof, the parties state:

1. Pursuant to this Court’s Order of July 27, 2020 [Dkt. 47], the discovery deadline is set on August 14, 2020.
2. The deposition of CSAA’s examiner/representative, Alana Hara, was set to be taken on August 11, 2020. Unfortunately, Ms. Hare woke up ill on this date and is unable to give her deposition as planned.
3. The parties and Ms. Hare are all available again for Ms. Hare’s deposition on August 19, 2020. Plaintiffs would like to take Ms. Hare’s deposition on that date.

4. All other discovery will be complete by August 14, 2020. The parties only seek to extend discovery until August 19, 2020, for the limited purpose of taking the deposition of Ms. Hare.

5. Two previous requests for extensions of deadlines have been made by the parties and were granted by this Court. On August 10, 2020, Plaintiff filed another motion to enlarge certain deadlines.

6. Allowing Alana Hare to be deposed on August 19, 2020, will not impact the scheduled trial in this case.

WHEREFORE, for good cause shown, the parties jointly request this Court to extend the discovery deadline five (5) days, or until August 19, 2020, for the limited purpose of deposing defendant's examiner/representative, Alana Hare.

Respectfully submitted,

s/ Gerard F. Pignato

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**ATTORNEYS FOR DEFENDANT**

*s/ Douglas Shelton*

*(Signed by filing attorney with permission)*

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**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 11, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Douglas J. Shelton – [dshelton@sheltonlawok.com](mailto:dshelton@sheltonlawok.com)

*s/ Gerard F. Pignato*

Gerard F. Pignato